

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRINK'S GLOBAL SERVICES USA, INC., a :
Delaware Corporation,
: Plaintiff, Civil Action No. 17-CV-6509 (JSR)
-against- : **NOTICE OF MOTION FOR A**
MIDWEST GOLDBUYERS, INC., a dissolved : **PRELIMINARY INJUNCTION**
Illinois Corporation, :
Defendant. :
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Frank Russo dated October 27, 2017 and all of the pleadings and proceedings herein, Plaintiff will move this Court, at the United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York, on November 27, 2017 at 4:00 p.m., for an Order, pursuant to the All-Writs Act and Rule 65 of the Federal Rules of Civil Procedure: (i) enjoining and restraining Midwest Goldbuyers, Inc., ("Midwest") from prosecuting a lawsuit, currently pending in Illinois state court, case no. 2017-L-005262; (ii) enjoining and restraining Midwest from continuing to disclose confidential information; and (iii) granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, answering papers, if any, are required to be served by November 13, 2017.

PLEASE TAKE FURTHER NOTICE THAT, reply papers, if any, are required to be served by November 20, 2017.

Dated: New York, New York
October 27, 2017

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212-704-6000

By:/s/ Stephen G. Rinehart

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*Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I, Stephen G. Rinehart, an attorney, certify that on this 27th day of October, 2017, service of a true and complete copy of the foregoing ***Plaintiff's Motion for Preliminary Injunction*** was made upon the following via e-mail and U.S. Mail:

To: James A. Karamanis, Esq.
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